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1834 North Circle Drive
Colorado Springs, CO 80909
October 25, 1998

Chairman William Kennard
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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Dear Chairman Kennard,

I am writing to you to add additional comments and to emphasize my e-mail letter to you of September, 1998, concerning the Low Power FM Petition for Rulemaking RM-9242.

I believe that LPFM stations of class 1 and class 2 (LPFM-1 and LPFM-2) operating in the same local area should be provided with sufficient maximum power levels to support themselves commercially.

The 3000 watt limit proposed in RM-9242 for LPFM-1 primary service seems reasonable if it is to compete successfully with full-power stations for the same advertising sources.

I do not envision LPFM-2 as a competitor for the same advertising resource as LPFM-1 stations.

If an LPFM-2 station is to be limited to less power than LPFM-1, I believe that LPFM-2 should be allowed a maximum power sufficient to provide a strong signal to an audience up to 5 miles from the station antenna in all directions, with a maximum antenna height above average terrain (HAAT) of 150 feet.

I am concerned that the 50 watt effective radiated power limit (ERP) for LPFM-2 as proposed in RM-9242 may not be sufficient to allow this type of station to survive economically. Also, I would prefer to broadcast with an antenna height in the range of 20-30 feet so as not to be excessively conspicuous in my residential neighborhood. This will probably require a higher maximum power limit to place a strong signal at my suggested 5 mile limit.

These are the only adjustments to RM-9242 that I have to recommend at this time, and I continue to prefer that a Notice of Proposed Rulemaking (NPRM) rather than a Notice of Inquiry (NOI) be issued by the FCC in November of this year regarding LPFM.

Thank you again for your attention.

Sincerely yours,
Gary Patzel

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